

**From:** [Jeffrey Delapena](#)  
**To:** [Cnty 2025 Comp Plan](#); [Ian Harkins](#)  
**Cc:** [Noelle Lovern](#); [Oliver Orjiako](#); [Jose Alvarez](#); [Jenna Kay](#)  
**Subject:** FW: BIA Public Comment for the DEIS  
**Date:** Wednesday, November 26, 2025 1:23:16 PM  
**Attachments:** [image001.png](#)  
[BIA Public Comment on DEIS for the 2025 Clark County Comprehensive Plan 11.26.2025.pdf](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Good day, Ian,

Thank you for submitting BIA's feedback related to the Draft Environmental Impact Statement for the 2025 Comprehensive Plan Update.

I have forwarded these comments to additional Staff and will enter them into the Index of Record.



**Jeff Delapena**  
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COMMUNITY PLANNING

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**From:** Ian Harkins <IHarkins@biaofclarkcounty.org>  
**Sent:** Wednesday, November 26, 2025 12:56 PM  
**To:** Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>  
**Cc:** Noelle Lovern <Noelle@biaofclarkcounty.org>  
**Subject:** BIA Public Comment for the DEIS

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Good Afternoon Clark County Communing Planning,

Please see the attached public comment from the Building Industry Association of Clark County on the DEIS.

Please confirm receipt of this email and attachment. Thank you!

**Ian Harkins | Government Affairs Coordinator**  
**BIA of Clark County - a Top 30 NAHB Association**  
*Protecting and promoting the building industry.*

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Clark County Council  
1300 Franklin Street  
Vancouver, WA 98660

November 26, 2025

**Public Comment on DEIS for the 2025 Clark County Comprehensive Plan — Support for Alternative 3 and a Balanced, Ownership-Inclusive Housing Supply**

To the Clark County Council and the Community Planning Team,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the 2025 Comprehensive Plan update. The BIA, as the largest construction-based association in Southwest Washington with over 750 members from across the construction industry, urge the County to select Alternative 3 as the Preferred Alternative and to explicitly commit, within the Final EIS and implementing policies, to a balanced housing supply that expands homeownership opportunities alongside multifamily rental production. While alternative 3 is the preferred choice, there must also be targeted expansions of the urban-growth areas to ensure there is adequate land supply for ownership opportunities.

**Why Alternative 3**

Alternative 3 is the best option that (1) evaluates site-specific requests in addition to city and county growth actions and (2) provides a realistic pathway to add serviced land near existing or planned infrastructure. That combination is essential to produce a full spectrum of housing types and prices, not just apartments, while aligning growth with utilities, transportation, and public services. The County's own DEIS describes the rapid increase in housing price, which clearly demonstrates high demand with inadequate supply. Per the DEIS, from 2020 to 2024, the median price of a home rose over 40%, from \$403,700 to \$568,600. In just four years, the median price of a home increased by \$164,900. This price increase will continue, and at a faster rate, if the county does not ensure there is adequate land supply for single-family homes that residents can own.

**The case for a balanced, ownership-inclusive supply**

1. **Homeownership is a primary path to intergenerational wealth.**

A plan that leans too heavily on multifamily rentals limits families' ability to build equity and roots in Clark County. The FEIS should explicitly analyze tenure mix (owner vs. renter) and ensure the growth strategy produces starter homes, townhomes, cottage courts, and small-lot single-family, not only apartments.

2. **Clark County's values and market realities.**

Clark County has long supported neighborhood stability, family formation, and small business growth, which are all outcomes strongly correlated with attainable homeownership. A one-sided multifamily strategy is not representative of Clark County's communities or preferences and will not meet the needs of young families, move-up buyers, and multigenerational households.

Clark County is expected to add over 190,000 new residents and over 100,000 new housing units over the next 20 years, according to the County's own DEIS. With construction costs and average rents continuing to grow, it is simply not feasible to expect new apartments and small-scale infill development to absorb the massive amounts of anticipated growth. If there is not an adequate land supply to provide additional homeownership opportunities, the price of existing homes will continue to rise. The demand for single-family homes is strong and will continue to rise as our community grows.

3. **Affordability requires both infill and new serviced land.**

Upzoning alone cannot overcome land scarcity, infrastructure bottlenecks, or the need for for-sale products with yards, garages, and flexible space. Strategic UGA expansions paired with middle-housing infill inside cities are both needed to reach price points first-time buyers can attain.

4. **Balanced growth improves resilience and fairness.**

Offering a range of housing choices, including ownership and rental, supports workforce retention, school enrollment stability, and fair housing objectives. It also spreads infrastructure loads and mitigations more proportionally.

**Specific requests for the Final EIS and Implementation**

1. **Select Alternative 3 as the Preferred Alternative.**

- Retain and analyze site-specific proposals that can deliver for-sale lots near existing/planned utilities.
- Prioritize expansions with near-term serviceability, clear phasing, and financing tools.

2. **Address true development patterns.**

- Report net new units and lots by tenure (owner vs. renter) and by price band in each alternative. Assuming that available land will develop at maximum density is simply incorrect. Past development patterns show that the majority of development does not occur at maximum density, for many reasons, and doing so artificially inflates the ability for currently sized UGAs to absorb growth effectively. The result of this inflation skews the supply and demand scale towards existing homeowners further exacerbating the housing problem.

**3. Adopt infrastructure-readiness and proportionality policies.**

- Tie growth areas to capital project timing and proportionate mitigation; avoid ad-hoc conditions that derail small plats.
- Publish permit cycle-time assumptions used in the DEIS and commit to transparent shot-clock/tolling rules.

**4. Map “ownership opportunity areas.”**

- Identify subareas including both infill and the UGA edge where missing-middle and small-lot plats are feasible, with model standards.
- Remove barriers (e.g., excessive minimum lot sizes, frontage overbuilds beyond adopted standards) that suppress entry-level ownership supply.

**Conclusion**

Clark County needs apartments and rentals, but not at the expense of homeownership. Selecting Alternative 3 and embedding the ownership outcomes above will better reflect Clark County’s values, support long-term family stability and wealth-building, and deliver a truly balanced, attainable housing market. It is critical to analyze and target UGA expansions to further accommodate homeownership opportunities, as homeownership is the key to building generational wealth and is the pillar of the American Dream.

Thank you for considering these comments. We look forward to a Final EIS that centers balanced supply, infrastructure readiness, and measurable homeownership outcomes, and not merely unit counts.

Respectfully,

Noelle Lovern

Executive Officer of the Building Industry Association of Clark County